IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

INNOVATIVE MEMORY SOLUTIONS, INC.,)
Plaintiff,))
v.)) C.A. No. 14-1480-RGA
MICRON TECHNOLOGY, INC.,)
Defendant.)

STIPULATION AND [PROPOSED] ORDER EXTENDING SCHEDULING ORDER DEADLINES

WHEREAS, on March 12, 2015, the Court entered a Scheduling Order (D.I. 20);

WHEREAS, on July 16, 2020, the Court entered a Revised Scheduling Order (D.I. 118);

WHEREAS, on January 27, 2021, the Court extended the deadlines in the Revised Scheduling Order (D.I. 178);

WHEREAS, the parties require additional time to complete discovery;

NOW THEREFORE, it is hereby stipulated and agreed, by and among the parties through their undersigned counsel, subject the approval of the Court, that the scheduling order deadlines are extended as follows:

Deadline	Current Date	Amended Date
Discovery Cut-Off	June 14, 2021	July 14, 2021
Opening Expert Reports	July 19, 2021	August 20, 2021
Rebuttal Expert Reports	August 23, 2021	September 17, 2021
Reply Expert Reports	September 16, 2021	October 8, 2021
Completion of Expert	October 14, 2021	November 8, 2021
Depositions		
Case Dispositive Motions	November 16, 2021	December 8, 2021
Pretrial Conference	March 25, 2022	No change
Trial	April 4, 2022 at 9:30 a.m. or	No change
	any of the three following	
	weeks	

/s/ Brian E. Farnan

Brian E. Farnan (#4089) Michael J. Farnan (#5165) Farnan LLP 919 North Market Street, 12th Floor Wilmington, DE 19801 (302) 777-0300 bfarnan@farnanlaw.com mfarnan@farnanlaw.com

OF COUNSEL:

Edward C. Flynn
Philip E. Levy
Nathaniel C. Wilks
Eckert Seamans Cherin & Mellott, LLC
600 Grant Street, 44th Floor
Pittsburgh, PA 15219
(412) 566-6000
EFlynn@eckertseamans.com
PLevy@eckertseamans.com
NWilks@eckertseamans.com

Robert W. Morris Eckert Seamans Cherin & Mellott, LLC 10 Bank Street, Suite 700 White Plains, NY 10606 (914) 286-6440 RWMorris@eckertseamans.com

Attorneys for Plaintiff
Innovative Memory Solutions, Inc.

/s/ Tyler E. Cragg

Frederick L. Cottrell, III (#2555)
Travis S. Hunter (#5350)
Tyler E. Cragg (#6398)
Richards Layton & Finger
920 North King Street
Wilmington, DE 19801
(302) 651-7700
cottrell@rlf.com
hunter@rlf.com
cragg@rlf.com

OF COUNSEL:

Jared Bobrow
J. Jason Lang
Orrick, Herrington & Sutcliffe LLP
1000 Marsh Road
Menlo Park, CA 94025-1015
650-614-7400
jbobrow@orrick.com
jlang@orrick.com

Will Melehani Orrick, Herrington & Sutcliffe LLP 405 Howard Street San Francisco, CA 94105 (415) 773-5700 wmelehani@orrick.com

Olamide Olusesi Orrick, Herrington & Sutcliffe LLP 1152 15th Street, N.W. Washington, D.C. 20005 (202) 339-8400 oolusesi@orrick.com

Attorneys for Defendant Micron Technology, Inc.

Dated: May 14, 2021

IT IS SO ORDERED, this day of	, 2021.	
	District Judge	